

EXHIBIT 4

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA - SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,)
PASSENGER SEXUAL ASSAULT)
LITIGATION)

_____) No. 3:23-md-03084-CRB

HIGHLY CONFIDENTIAL UNDER PROTECTIVE ORDER

REMOTE VIDEOTAPED DEPOSITION OF EMILIE BOMAN

AS 30(b)(6)

OCTOBER 1, 2025

VIA ZOOM

REPORTED BY: PATRICIA Y. SCHULER, CSR NO. 11949

1 is a partnership between NSVRC, ValorUS, formally
2 CAL Casa, and the National Alliance to End Sexual
3 Violence."

4 Do you see that?

5 A. I do.

6 Q. It says, "They are a subsidiary of the
7 Pennsylvania Coalition Against Rape."

8 Do you see that?

9 A. I do.

10 Q. Do you see that?

11 A. I do.

12 Q. Okay. So you understand that Raliance is
13 actually a partnership that includes these separate
14 organizations, NSVRC, which is -- well, tell the
15 jury what NSVRC stands for.

16 A. This is testing my memory. I think it is
17 National Sexual Violence Resource Center.

18 Q. Okay. And Uber paid a lot of money to
19 that group, right?

20 A. I would have to check the deposition aid
21 to recall the specific amount paid to NSVRC.

22 Q. Okay. Uber has paid money to this
23 nonprofit organization, correct?

24 A. Would you like for me to check?

25 Q. Sure. Why don't you let us know exactly

1 A. Based on the deposition aid, in total, we
2 have paid, as far as I am aware, [REDACTED].

3 Q. And that is the testimony Uber is giving
4 today in terms of the total amount of money that
5 has been paid to Raliance by Uber?

6 A. As best as we can tell, yes.

7 Q. So you don't keep careful records of
8 that?

9 MS. LEVY: Object to form.

10 THE WITNESS: We have a system where we
11 track payments -- that our financial team tracks
12 payments. I will say the system seems a little bit
13 imperfect. Certainly, looking back at payments made
14 pre2020, it was slightly more challenging to find
15 payments. So we have done the best that we could to
16 pull together an overview of the payments made to
17 these groups.

18 BY MS. WALSH:

19 Q. So sitting here today, Uber, under oath
20 for this deposition, is not actually able to tell
21 the jury the total amount of money that it has paid
22 to Raliance, correct?

23 MS. LEVY: Object to form.

24 You can answer again.

25 THE WITNESS: I am able to share, based on

1 A. I do.

2 Q. And it says, "As set forth in the amended
3 and restated master services agreement, attached
4 hereto as Exhibit A."

5 Do you see that?

6 A. I do.

7 Q. And that master services agreement, which
8 we are going to look at in a minute, that is the
9 agreement that governed the financial relationship
10 between Uber and NSVRC, or PCAR, at this time,
11 correct?

12 A. I am not sure, without looking at the
13 document.

14 Q. But you cite it on your deposition aid,
15 right?

16 A. It was included as one of the examples
17 here, yes.

18 Q. Well, let's take a look at it.

19 So you did not review it in preparation
20 for your deposition today?

21 A. No. As I mention already, I did not look
22 at the NSA related to National Sexual Violence
23 Resource Center.

24 Q. Okay. Before we go to the next page, you
25 see that this document was signed by Andrew Byrne

1 A. I would disagree with how that is being
2 characterized. We built relationships with a
3 number of women's advocacy originations through
4 engagements, listening sessions, attending
5 conferences.

6 For some of the organizations that we
7 felt like actually we could scope out some real
8 work of substance with these organizations, that is
9 when we would enter into a contract around a
10 particular piece of work or deciding to include
11 them as one of our driving change partners, which
12 is our grant fund to support organizations and
13 working to end gender-based violence.

14 So there is a subset of organizations
15 that received some form of financial payment from
16 Uber, but that is certainly not true of all
17 organizations that we have relationships with.

18 Q. Ms. Boman, how many organizations did
19 Uber list on the deposition aid that you brought
20 here today to help with your testimony? How many
21 different organizations are on there as
22 organizations that Uber has paid money to? Have
23 you counted?

24 A. Yes. We included a number here. It
25 is -- I believe it is 242 organizations globally.

1 Q. And you want to improve Uber's brand,
2 right?

3 A. We want to demonstrate that Uber is
4 working closely with advocates to invest in women's
5 safety, both on and off the platform.

6 Q. Okay. The companies that don't support
7 Uber's program, business, or brand, they get the
8 least amount of money, and that is an exit grant,
9 right?

10 A. Do you mean the nonprofits? You said
11 "the companies," so I was --

12 Q. Oh, yeah, yeah. Sorry.

13 So the NGOs or the organizations that
14 don't add value to Uber's program, business, and
15 brand, they get the least amount of money, right?

16 A. Well, I would take a step back and just
17 ground ourselves in, we have a number of women's
18 safety advocate partners every year that we have
19 included in the deposition aid. There are a small
20 number that are selected or applied to be a Driving
21 Change grant recipient. At the end of every grant
22 funding period, we look at which partnerships
23 worked well for both sides and which might not
24 actually be the best value to Uber or the best
25 value to the partner going forward, based on a

1 A. What I know from the documents I have
2 included in our deposition aid, such as the Driving
3 Change blog post, we began working with RAINN -- or
4 we announced a collaboration with RAINN as part of
5 Driving Change in 2018.

6 Q. But within the company, you all were
7 talking about the fact that RAINN did not have a
8 whole lot of credibility in the advocacy community,
9 right?

10 MS. LEVY: Object to form; foundation and
11 scope with this witness.

12 THE WITNESS: Well, all I can say is that
13 it appears two employees have raised concerns about
14 RAINN.

15 (Exhibit 2044 was marked for
16 identification.)

17 BY MS. WALSH:

18 Q. Well, let's look at another employee
19 raising concerns about RAINN. And to do that,
20 let's look at AW148, which will be 2044.

21 If we look down, we see that this is an
22 email between Gus Fuldner and Tony West, copying
23 Ms. Breeden, correct? Correct?

24 MS. LEVY: Give us a second.

25 ///

1 master services agreement between Uber and Raliance
2 in 2021.

3 Did you know that?

4 A. I have a vague recollection of us
5 renewing our agreement with Raliance, yes.

6 Q. Is that reflected on your deposition aid?

7 A. Again, we were looking at payments. So
8 my records show here, in 2021, there is one payment
9 that we made to them, and then a number of payments
10 in 2020 and 2022.

11 Q. Does your deposition aid reflect a
12 payment in 2021 of [REDACTED]?

13 A. I have [REDACTED] marked here.

14 (Exhibit 2063 was marked for
15 identification.)

16 BY MS. WALSH:

17 Q. Okay. Well, let's take a look at 89C,
18 AW89C, which we are going to mark as 2063, please.

19 MS. WALSH: We can take this one down.

20 Thanks.

21 BY MS. WALSH:

22 Q. 2063 is going to be AW89. This is it.

23 This is a -- do you recognize this master
24 services agreement between Uber and PCAR, doing
25 business as Raliance, effective August 4, 2021?